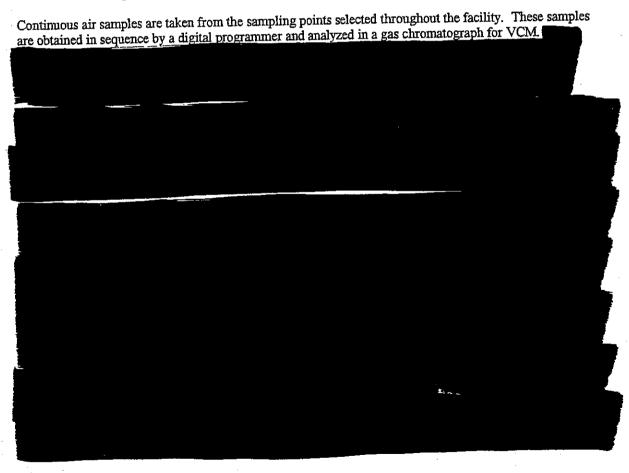
# **Appendix C**

# Vinyl Chloride Continuous Monitoring System Program 40 CFR 61.65(b)(8)(i) Formosa Plastics Corporation, Delaware

# L LEAK DETECTION AND PLAN OF ACTION

The Vinyl Chloride Monitoring System allows for quick detection of major Vinyl Chloride Monomer (VCM) leaks. The system has the capability to monitor sample points throughout the facility. Currently, forty-six sample points are being used for EPA and OSHA monitoring. These sampling points are strategically located throughout the plant to detect or indicate leaks or VCM excursions from potential leak sources. (See Table 3 for equipment in VCM service.) Monitoring locations have been selected based on areas with the highest potential for VCM leaks. (See Table 1 for VCM sample point locations.)



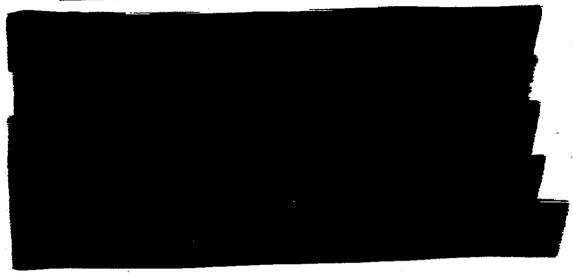
# II. CALIBRATON OF MONITORING SYSTEM EQUIPMENT

A. Vinyl Chloride Monitoring System

For each of the gas chromatographs used in the Vinyl Chloride Monitoring System, a span check is performed daily using a calibration gas cylinder standard.

This daily calibration will be done with a standard whose gas composition is certified by the manufacturer and has the recommended maximum shelf life, date of preparation, and certified vinyl chloride concentration affixed to the cylinder.

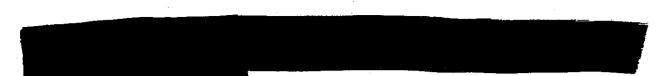
# B. <u>Portable Hydrocarbon Detector</u>



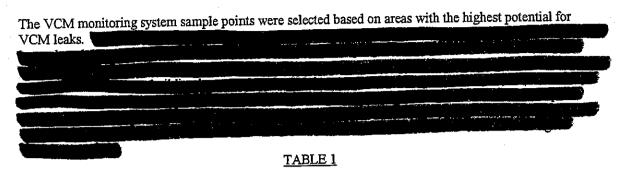
#### III. MAINTENANCE

IV. RECORDKEEPING

CONFIDENTIAL



# VCM MONITORING SYSTEM SAMPLE POINT LOCATION



	GC1 S2 Reactor	GC2 Tank Farm	GC3 E2 Reactor	GC4 WWTP
1				
2				
3				
4				
5	8			
6				
7		<u> </u>		
8 9				
10				
11				
12				
13				
14				
15				
15 16				
17	2720 C D	m State of the sta		
18				
19				
20				
		<u> </u>		

# TABLE 2 PREVENTATIVE MAINTENANCE SCHEDULE FOR VCM MONITORING SYSTEM

Auto Span Check (EPA)
Bottle and regulator inspection
Oven temperature check
Pump operation check
General Inspection of the sample valve manifold
Incinerator Continuous Emission Sample line test
Clean computer cabinet and filters
Alarm panel, emergency light, and standards test



Detector and slide valve maintenance
Sample valves
Sample point filter replacement
Pump maintenance
Test Analog input boards
Replace columns
Test all samples valves for proper operation
Emergency blue light I/O test
Sample valves I/O test

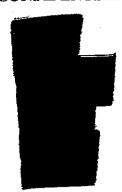


TABLE 3 VCM HANDLING EQUIPMENT LIST

